1 2 3 4 5 6 7 8 9 10 11	Paul Marron, Esq., State Bar No. 128245 Mark J. Polland, Esq., State Bar No. 210657 MARRON LAWYERS 320 Golden Shore, Suite 410 Long Beach, CA 90802 Tel.: 562.432.7422 Fax: 562.432.8682 E-mail: pmarron@marronlaw.com E-mail: mpolland@marronlaw.com  Attorneys for LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON CARO I, LLC; HANBON MI I, LLC; HANBON MI II, INC.; HANBON MARLETTE, LLC; HANBON PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.		
12	IN THE UNITED STATES DISCTRICT COURT		
	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14			
15	CORNERSTONE STAFFING SOLUTIONS, INC., a California Corporation,	Case No.: 3:12-cv-01527-RS	
16	Plaintiff,	Assigned to Hon. Richard Seeborg	
17	riamuir,	STIPULATION TO ADVANCE THE	
18	vs.	DATE FOR THE HEARING ON THE NEXT CASE MANAGEMENT	
19	LARRY THAXTER JAMES an individual; DAVID	CONFERENCE AND [ <del>PROPOSE</del> D] ORDER	
	R. BATTON, an individual; TED MANNELLO, an individual; ANDRE DOUZDJIAN, an individual;	Complaint Filed: March 27, 2012	
20	MICHAEL SANTOS, an individual; MARCOS	Trial Date: October 28, 2013	
21	BARRERA, an individual; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC., a		
22	Michigan corporation; BATTON DIVERSIFIED		
23	STAFFING SOLUTIONS, a Michigan corporation; HANBON-CARO I, LLC, a Michigan limited		
24	liability company a/k/a CARO I, LLC; HANBON		
	MI I, LLC, a Michigan limited liability company d/b/a TECHNICAL ENGINEERING		
25	CONSULTANTS; HANBON - MI II, INC., a		
26	Michigan corporation d/b/a BATTON TECHNICAL		
27	ENGINEERING CONSULTANTS; HANBON MARLETTE, LLC, a Michigan limited liability		
28	company; HANBON - PA I, LLC a Pennsylvania		
۷٥	limited liability company; HANBON - CT I, LLC a		

Connecticut limited liability company; TEC GROUP 1 INC., a Michigan corporation d/b/a TEC GROUP ALSO d/b/a TEC-CHRYSLER; DEPLOY HR, 2 INC., a Pennsylvania corporation d/b/a DEPLOY HR STAFFING, INC.; DEPLOYHR, INC., a 3 California corporation d/b/a TEC ALSO d/b/a BATTON; and DOES 1-100, 4 5 Defendants. 6 7 **STIPULATION** 8 The parties signing below acknowledge the following: 9 1. The Court recently ordered a continuance of the date for the hearing on 10 Defendants' motions to dismiss CornerStone Staffing Solutions, Inc.'s ("CornerStone") First 11 Amended Complaint ("FAC") in the above-entitled matter from November 15, 2012 to December 12 13, 2012, at 1:30 p.m. In addition, the Court ordered all parties to appear in person for that 13 hearing. 14 2. The current date for the next Case Management Conference ("CMC") in this matter 15 is set for December 20, 2012. The CMC was set for that date in order to allow time for the 16 Settlement Conference among the parties to be completed prior to the CMC. 17 3. The Settlement Conference is scheduled with the Honorable Magistrate Vadas in 18 San Francisco for November 30, 2012. 19 /// 20 21 22 23 24 25 26 27 28

Based on the foregoing, the parties signing below stipulate and respectfully request the 1 Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to 2 consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another 3 hearing on the following week. Because the Settlement Conference will proceed on November 30, 4 it will be completed well in advance of the December 13 hearing date. 5 IT IS SO STIPULATED. 6 7 MARRON LAWYERS Dated: 11.8.12 Signed PAUL MARRON 9 MARK POLLAND Attorneys for Defendants LARRY JAMES; DAVID 10 R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS. INC.; BATTON, INC.; HANBON -- CARO I, LLC; 11 HANBON -- MI I, LLC; HANBON MI II, INC.; HANBON -- MARLETTE, LLC; HANBON -- PA 12 I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.: 13 DEPLOYHR, INC. 14 WOODS LAW GROUP 15 16 Dated: Signed: BRINY WOODS 17 Attorneys for Defendant MICHAEL SANTOS and HANBON – CT I, LLC 18 19 **BURKHARDT & LARSON** 20 Dated: Signed: 21 PHILIP BURKHARDT Attorneys for Defendant MARCOS BARRERA 22 HILL, FARRER & BURRILL LLP 23 24 Signed: Dated: 25 **NEIL MARTIN** CLAYTON HIX 26 Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter-27 Defendant MARY ANDERSON 28 3 Case No. 3:12-ev-01527-RS

- 11	li .			
1	Based on the foregoing, the partie	es signing below stipulate and respectfully request the		
2	Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to			
3	3 consolidate the CMC on the same date as	consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another		
4	4 hearing on the following week. Because the	hearing on the following week. Because the Settlement Conference will proceed on November 30,		
5	5 it will be completed well in advance of the	December 13 hearing date.		
6	IT IS SO STIPULATED.			
7	7 MAR	RRON LAWYERS		
8	8 Dated: Signe	ed:		
9		PAUL MARRON MARK POLLAND		
0		Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON		
1		TECHNICAL ENGINEERING CONSULTANTS, INC.; BATTON, INC.; HANBON CARO I, LLC;		
2		HANBON MÍ I, LLC; HANBON MI II, INC.; HANBON MARLETTE, LLC; HANBON PA		
3		I, LLC; TEC GROUP, INĆ.; DEPLOY HR, INC.; DEPLOYHR, INC.		
4		<b>,</b>		
5	WOO	DDS LAW GROUP		
6	11/01	ed: Back a		
7		BRINY WOODS Attorneys for Defendant MICHAEL SANTOS and		
8		HANBON – CT I, LLC		
9		KHARDT & LARSON		
	20			
	Dated: Signe	ed: PHILIP BURKHARDT		
	22	Attorneys for Defendant MARCOS BARRERA		
j	HILL 23	., FARRER & BURRILL LLP		
l	24			
1	Dated: Signe	ed: NEIL MARTIN		
		CLAYTON HIX Attorneys for Plaintiff CORNERSTONE		
ŀ	26   27	STAFFING SOLUTIONS, INC. and Counter- Defendant MARY ANDERSON		
		Detellualit MANDENSON		
28	28	2		
		3 Case No. 3:12-cv-01527-RS		
		Case No. 3:12-cv-01		

- 11			
1	Based on the foregoing, the parties signing below stipulate and respectfully request the		
2	Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to		
3	consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another		
4	hearing on the following week. Because the Settlement Conference will proceed on November 30,		
5	it will be completed well in advance of the December 13 hearing date.		
6	IT IS SO STIPULATED.		
7	MARRON LAWYERS		
8	Dated: Signed: PAUL MARRON MARK POLLAND		
10	Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS,		
11	INC.; BATTON, INC.; HANBON CARO I, LLC; HANBON MI I, LLC; HANBON MI II, INC.;		
12 13	HANBON MARLETTE, LLC; HANBON PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.; DEPLOYHR, INC.		
14			
15	WOODS LAW GROUP		
16 17 18	Dated: Signed: BRINY WOODS Attorneys for Defendant MICHAEL SANTOS and HANBON – CT I, LLC		
19 20 21	Dated:		
22	HILL, FARRER & BURRILL LLP		
24   25   26	Dated: Signed:  NEIL MARTIN CLAYTON HIX Attorneys for Plaintiff CORNERSTONE		
27 28	STAFFING SOLUTIONS, INC. and Counter- Defendant MARY ANDERSON		
-	3		
	Case No. 3:12-cv-01527-RS		

## Case 3:12-cv-01527-RS Document 79 Filed 11/09/12 Page 6 of 7

1	Based on the foregoing, the parties signing below stipulate and respectfully request the		
2	Court to advance the CMC from December 20, 2012, to December 13, 2012, at 1:30 p.m. to		
3	consolidate the CMC on the same date as the hearing on the motions to dismiss and avoid another		
4	hearing on the following week. Because the Settlement Conference will proceed on November 30,		
5	it will be completed well in advance of the December 13 hearing date.		
6	IT IS SO STIPULATED.		
7	MARRON LAWYERS		
8	Dated: Signed:PAUL MARRON MARK POLLAND		
10	Attorneys for Defendants LARRY JAMES; DAVID R. BATTON; ANDRE DOUZDJIAN; BATTON TECHNICAL ENGINEERING CONSULTANTS,		
11	INC.; BATTON, INC.; HANBON CARO I, LLC; HANBON MI I, LLC; HANBON MI II, INC.;		
12	HANBON MARLETTE, LLC; HANBON PA I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;		
13	DEPLOYHR, INC.		
14 15	WOODS LAW GROUP		
16 17 18	Dated: Signed:BRINY WOODS Attorneys for Defendant MICHAEL SANTOS and HANBON – CT I, LLC		
19	BURKHARDT & LARSON		
20 21	Dated: Signed:  PHILIP BURKHARDT  Attorneys for Defendant MARCOS BARRERA		
22   23	HILL, FARRER & BURRILL LLP		
24	D. 1. 11/4/12 Signed:		
25	Dated: 11/8/12 Signed: NEIL MARTIN CLAYTON HIX		
26 27	Attorneys for Plaintiff CORNERSTONE STAFFING SOLUTIONS, INC. and Counter- Defendant MARY ANDERSON		
28	Dolonguit March 1110 Dicon		
20	3		

[PROPOSED] ORDER Pursuant to the foregoing stipulation, the Court orders that the date for the Case Management Conference in the above-entitled matter is advanced from December 20, 2012 to December 13, 2012 at 1:30 p.m. The December 20, 2012 date is vacated. IT IS SO ORDERED. Date: \_11/9/12 The Honorable Richard Seeborg Judge of the United States District Court